

JAP:NR

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. §§ 841(a)(1)
and 841(b)(1)(B)(ii)(II))

LUIS QUINONES,

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

EDWARD RAPP, being duly sworn, deposes and states that he is a Detective with the Port Authority Police Department ("PAPD") assigned to the Drug Enforcement Task Force, duly appointed according to law and acting as such.

Upon information and belief, on or about May 15, 2012, within the Eastern District of New York and elsewhere, defendant LUIS QUINONES did knowingly, intentionally and unlawfully possess with intent to distribute a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(ii)(II)).

The source of your deponent's information and the grounds for his belief are as follows:^{1/}

^{1/} Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

1. On May 15, 2012, the defendant LUIS QUINONES arrived at John F. Kennedy International Airport in Queens, New York, aboard Jet Blue Flight No. 710 from San Juan, Puerto Rico.

2. QUINONES was observed at the baggage claim area and appeared nervous. He was approached by Drug Enforcement Task Force agents and officers and asked if he would answer questions related to his travel. QUINONES agreed to answer questions.

3. QUINONES had with him a checked bag. He acknowledged that it was his bag and produced a driver's licensed, issued by Puerto Rico, that matched the name on the luggage tag attached to the bag. Agents and officers asked if QUINONES would consent to a search of the bag. QUINONES consented to the search and produced a key from his pocket that unlocked the lock attached to the bag.

4. Agents and officers searched the bag and discovered two brick-shaped packages secreted within a pillow.

5. QUINONES and his personal effects were then transported to a Drug Enforcement Task Force office located in John F. Kennedy International Airport. At the office, agents and officers probed the brick-shaped packages from QUINONES' bag and discovered a white, powdery substance that field-tested positive for cocaine. Subsequent to being read his Miranda rights, QUINONES admitted to agents that he was being paid \$1,000 to bring the drugs into New York.

6. The total gross weight of the cocaine found in defendant QUINONES' bag is approximately 2,740 grams.

WHEREFORE, your deponent respectfully requests that the defendant LUIS QUINONES be dealt with according to law.



EDWARD RAPP
Detective
Port Authority Police Department
Drug Enforcement Task Force

Sworn to before me this
16th day of May, 2012

THE HON. ROANNE L. MANN
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK